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Attorneys for Defendant  
LIFEFORCE DIGITAL INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

THRESHOLD ENTERPRISES LTD., a  
Delaware corporation,

Plaintiff,

v.

LIFEFORCE DIGITAL INC., a Delaware  
corporation,

Defendant.

Case No.: 5:22-cv-06483-PCP

**DECLARATION OF GEORGE SPATZ IN  
SUPPORT MOTION IN LIMINE NO. 1**

I, George Spatz, declare:

1. I am counsel for Lifeforce Digital Inc. ("LDI"), the Defendant in the above-captioned matter.

2. I submit this declaration in support of LDI's Motion in Limine No. 1. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

3. Attached hereto as Exhibit A is a true and correct copy of Threshold Enterprises, Ltd.'s, Initial Disclosures produced in the above-captioned proceeding.

4. On December 14, 2023, Barry Sugarman sat for his deposition in the above-captioned matter. Attached hereto as Exhibit B are true and correct copies of the relevant portions of Mr. Sugarman's deposition transcript.

5. On December 13, 2023, Brian Cayton sat for his deposition in the above-captioned matter. Attached hereto as Exhibit C are true and correct copies of the relevant portions of Mr. Cayton's deposition transcript.

6. On December 15, 2023, Ira Goldberg sat for his deposition in the above-captioned matter. Attached hereto as Exhibit D are true and correct copies of the relevant portions of Mr. Goldberg's deposition transcript.

7. On April 3, 2024, David Franklyn sat for his deposition in the above-captioned matter. Attached hereto as Exhibit E are true and correct copies of the relevant portions of Mr. Franklyn's deposition transcript.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed May 13, 2024.

/s/George Spatz

George Spatz